

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

JACQUELYN CHIAO, CHRISTINA KIM,  
ADRIANA PARANOVA and DANIELLE  
SIMMONS,

*Plaintiffs*

vs.

UNITED AIRLINES, INC., a Delaware  
Corporation,

*Defendant*

**Case No.: 1:25-cv-00687 ELH**

**PLAINTIFF’S RESPONSE TO DEFENDANT UNITED AIRLINES, INC.’S  
(UNITED) PARTIAL MOTION TO DISMISS**

Defendant United Airlines, Inc. moved to dismiss Plaintiffs’ complaint, specifically as to Plaintiffs Jacquelyn Chiao, Adriana Parvanova, and Danielle Simmons for the failure to state a claim for which relief could be provided. Plaintiffs believe the current complaint adequately states the claims, however, to a degree, the Plaintiffs concede that the initial complaint could be more artfully drafted. As such, rather than the court granting the Defendant’s current motion, the Plaintiffs request the court’s permission to file an amended complaint where the facts and claims are more specifically raised.

Rule 15 of the Federal Rules of Civil Procedure provides, in relevant part, “[a] party may amend its pleading once . . . if the pleading is one to which a response pleading is required, 21 days after service of a responsive pleading or 21 days after service of a motion under Rule 12(b), (e), or (f), whichever is earlier. Fed. Rule. of Civ. Proc. 15. Defendant’s Motion to Dismiss qualifies under Rule 15 as a pleading requiring a response from the Plaintiffs.

Therefore, the Plaintiffs respectfully request that the Court denies the Defendant's Motion to Dismiss and grant the Plaintiffs leave to amend their complaint so that the requisite facts and allegations are better sufficiently pled.

Date: June 3<sup>rd</sup>, 2025.

Respectfully submitted,

By: /s/ John E. Herrick  
John E. Herrick Esq.  
**MOTLEY RICE LLC**  
28 Bridgeside Boulevard  
Mount Pleasant, South Carolina 29464  
(843) 216-9000 (Office)  
(843) 216-9450 (Facsimile)

**CERTIFICATE OF SERVICE**

The undersigned certifies that, on June 3, 2025, pursuant to Fed. R. Civ. P., a true and correct copy of the foregoing Plaintiff's Response to Defendant United Airlines, Inc.'s Motion to Dismiss, was filed with the Clerk of Court using the CM/ECF System, which will send notification of such filing to all counsel of record at the email address on file with the court.

/s/ John E. Herrick  
John E. Herrick